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ENVIRONMENTAL DIV.  
OPERATIONS OFC.

November 7, 2012

Mr. Robert Werner  
Enforcement Officer  
Superfund Enforcement Assessment Section (6SF-TE)  
U.S. EPA, Region 6  
1445 Ross Avenue  
Dallas, TX 75202-2733

**Re: Delta Shipyard Superfund Site, Houma, Terrebonne Parrish, Louisiana  
SSID No. 06GC**

Dear Mr. Werner:

Pursuant to the letter dated October 11, 2012, received by Canal Barge Company, Inc. (CBC) on October 18, 2012, enclosed is CBC's response to Enclosure 3, Delta Shipyard Superfund Site Information Request. CBC conducted a conscientious, diligent and good faith effort to find any records or other information relating CBC to any of the entities named in the Information Request (DIWI, CAC, DSI, and/or DS), but have been unsuccessful in finding any such documents or information. Additionally, I contacted the only personnel known to CBC to still be alive and to have been employed by CBC back in the timeframe that is the subject of the Information Request, including Mr. James O. Gundlach, who is shown as CBC's contact on the list captioned "Delta Shipyard Top Customers 9/18/80," and again our efforts have proven fruitless to develop any information or documents responsive to the Information Request. I respectfully submit that the 9/18/80 date shown on that Delta Shipyard list well pre-dates any records in CBC's possession.

Since CBC cannot locate records related to any of the identified entities in your information request, we request that you provide us any records that you have linking CBC to any of these entities. Once received, we can further investigate and supplement this response if appropriate. Otherwise, please don't hesitate to contact me if further information is needed by the EPA in regard to this matter.

Sincerely,

Thomas O. Lind  
General Counsel & Secretary

TOL/amc  
Encl.

**ENCLOSURE 3**  
**DELTA SHIPYARD SUPERFUND SITE**  
**INFORMATION REQUEST**

**QUESTIONS**

1. Please identify the person(s) that answer the below questions on behalf of the Canal Barge Company, Inc. (CDC), a Louisiana corporation. Please also include the person(s) contact information (address, phone number, e-mail address).

**Thomas O. Lind, General Counsel & Secretary, Canal Barge Company, Inc.**  
**835 Union Street, New Orleans, LA 70112; Telephone 504-584-1531;**  
**email: [tlind@canalbarge.com](mailto:tlind@canalbarge.com)**

2. Please explain the business relationship, if any, that existed between your company and/or one or more of the following business entities:

A. Any corporate entity known as Delta Iron Works, Inc. (DIWI) that was related to,

or associated with, a business entity that operated a boat and barge cleaning and repair facility at the Site.

**Despite diligent and good faith efforts, we have been unable to find any records concerning DIWI or locate any personnel who have knowledge of DIWI; consequently, CDC is unaware of any such business relationship.**

- B. Any corporate entity known as Chromalloy American Corporation (CAC) that was related to, or associated with, a business entity that operated a boat and barge cleaning and repair facility at the Site.

**Despite diligent and good faith efforts, we have been unable to find any records concerning CAC or locate any personnel who have knowledge of CAC; consequently, CDC is unaware of any such business relationship.**

- C. The partnership known as Delta Services Industries (DSI) that was related to, or associated with a business entity that operated a boat and barge cleaning and repair facility at the Site.

**Despite diligent and good faith efforts, we have been unable to find any records concerning DSI or locate any personnel who have knowledge of DSI; consequently, CDC is unaware of any such business relationship.**

- D. The non-incorporated business entity known as Delta Shipyard (DS) that operated a boat and barge cleaning and repair facility at the Site.

**Despite diligent and good faith efforts, we have been unable to find any records concerning DS or locate any personnel who have knowledge of DS; consequently, CDC is unaware of any such business relationship.**

3. At any time did your company contract with or arrange for DIWI, CAC, DSI, and/or DS to clean and/or repair any tank, boat, barge, and/or floating object (hereafter referred to as "your equipment") that your company owned, rented, leased, and/or used? If the answer to this question is yes, please answer the following questions:

**To the best of our knowledge, information and belief, following a diligent and good faith search of CDC's records and attempts to locate and**

**interview any employees (current and/or former) of CDC who may have, or may have had, information regarding any of these entities, the answer to this question must be "no."**

- A. Please provide copies of all documents reflecting such contracts and/or arrangements. **Not applicable**
  
- B. Provide names, addresses, and telephone numbers of any individuals, including your former employees, who may have knowledge of these contracts or arrangements. **Not applicable**
  
- C. To the best of your knowledge, at anytime did DS clean and/or repair any of your equipment at or near the Site after it had been used to store or transport materials, hazardous materials, hazardous substances, and/or hazardous wastes ("materials"). If your answer to this question yes, please respond to the following: **Not applicable**

- 1) Please provide copies of all documents in your possession that identify all materials in your equipment prior each cleaning and/or repairing event at or near the Site by DS, or **Not applicable**
- 2) If documents are not in your possession, to the best of your knowledge, identify all materials in your equipment prior each cleaning and/or repairing event at or near the Site by DS, and **Not applicable**
- 3) To the best of your knowledge, describe the volume of material cleaned and/or removed from your equipment at or near the Site by DS, i.e., materials retained by DS. **Not applicable**
- 4) To the best of your knowledge, identify the source(s) of materials for each event that material was cleaned and/or removed from your equipment at or near the Site by DS. **Not applicable**
- 5) Please provide copies of all internal documents in your possession that pertain hazardous materials that were contained and/or transported to the Site in your equipment. **Not applicable**
- 6) List all federal, state, and local permits, identification numbers, and/or registrations issued to your company for storage, transport, and/or disposal of